REMARKS

[0003] Applicant respectfully requests reconsideration and allowance of all of the claims of the application. Claims 4, 9, 14, 21 and 24 are presently pending. Claims 4, 9 and 14 have been amended herein. Claims 21 and 24 are herein withdrawn or cancelled.

Substantive Matters

Claim Rejections under § 112

[0004] Claims 4, 9 and 21 stand rejected under 35 U.S.C. § 112, 2nd ¶. Claim 21 has been canceled, rendering the rejection moot. Claims 4 and 9 have been amended to correct the antecedent issues. In light of the amendments presented herein, Applicant submits that these rejections are moot. Accordingly, Applicant asks the Examiner to withdraw these rejections.

Claim Rejections under §103(a)

[0005] Claims 4, 9, 21 and 24 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent Application Publication No. 2002/0059623 to Rodriguez in view of U.S. Patent No 5,990,883 to Byrne in view of U.S. Patent No. 5,799,150 to Hamilton. Claim 14 has been rejected under 35 U.S.C. §103(a) as being unpatentable over Rodriguez in view of Hamilton. In light of the amendments presented herein, Applicant submits that these rejections are moot. Accordingly, Applicant asks the Examiner to withdraw these rejections.

Obviousness Rejections

Lack of *Prima Facie* Case of Obviousness (MPEP § 2142)

[0006] Applicant disagrees with the Examiner's obviousness rejections. Arguments presented herein point to various aspects of the record to demonstrate that all of the criteria set forth for making a prima facie case have not been met.

[0007] **Independent claim 4** has been amended to recite in pertinent part a method comprising:

> sorting the records in the tables at a head end device according to a selected field type prior to delivery of the program data to a remote client device, wherein the sorting comprises arranging the program records in the tables according to a stopped name version of the program name in the title field and **compressing the program records by substituting a value for a character sequence in the program records, the values being stored in a code table, wherein the character sequence being substituted is selected based upon a frequency that the character sequence is found within the records**;

[0008] The cited art fails to teach or suggest to one of ordinary skill in the art a method that includes "compressing the program records by substituting a value for a character sequence in the program records, the values being stored in a code table, wherein the character sequence being substituted is selected based upon a frequency that the character sequence is found within the records". Rodriguez is completely silent as to character sequences being substituted with a

value based upon the frequency that the character sequence is found within the records.

[0009] The only reference to compression in Rodriguez can be found at paragraph [0065]. Paragraph [0065] states:

> [0065] The FLASH memory 351 also contains a platform library 356. The platform library 356 is a collection of utilities useful to applications, such as a timer manager, **a compression manager**, a configuration manager, an HTML parser, a database manager, a widget toolkit, a string manager, and other utilities (not shown). These utilities are accessed by applications via application programming interfaces (APIs) as necessary so that each application does not have to contain these utilities. Two components of the platform library 356 that are shown in FIG. 4 are a window manager 359 and a service application manager (SAM) client 357. The window manager 359 provides a mechanism for implementing the sharing of the display device screen regions and user input. The window manager 359 on the DHCT 14 is responsible for, as directed by one or more applications, implementing the creation, display, and de-allocation of the limited DHCT 14 screen resources. It allows multiple applications to share the screen by assigning ownership of screen regions, or windows.

[0010] Rodriguez does not teach any specifics on how program records are compressed. Rodriguez simply discloses that the platform library 356 includes a compression manager. Rodriguez is silent as to the specifics of how the compression manager might operate. Rodriguez does not teach that the program records are compressed by substituting a value for a character sequence in the program records, the values being stored in a code table,

wherein the character sequence being substituted is selected based upon a frequency that the character sequence is found within the records". Byrne and Hamilton do not rectify the deficiency of Rodriguez.

[0011] Hamilton does not teach the specifics of compressing a program record in the manner claimed in independent claim 4. Hamilton instead simply teaches that video data can be compressed. Hamilton specifically teaches (See Column 1, lines 36-40):

> Capture involves generating digital media from typically analog media. For example, video signals on a video tape or on film are converted into a sequence of two-dimensional digital still images. These images are typically compressed using **known compression systems** so as to reduce storage requirements.

[0012] Hamilton, just as Rodriquez, is completely silent as to how a program record is compressed. Hamilton simply suggests that digital media can be compressed. As such, Hamilton does not teach or suggest the specific elements of claim 4.

[0013] Byrne is completely silent as to program record compression or compression techniques. As such, Byrne cannot teach or suggest "compressing the program records by substituting a value for a character sequence in the program records, the values being stored in a code table, wherein the character sequence being substituted is selected based upon a frequency that the character sequence is found within the records".

[0014] As shown above, the combination of Rodriguez, Hamilton and Byrnes does not disclose all of the claimed elements and features of claim 4. Accordingly, Applicant asks the Examiner to withdraw the rejection of this claim.

[0015] **Independent claim 9** has been amended to recite in pertinent part a method for delivering program data for an electronic program guide executing at a remote client, the method comprising:

> sorting the records in the program tables at a head end device, wherein the sorting comprises arranging the records according to stopped name versions of program names in a title field and **compressing the records by substituting a value for a character sequence in the records, the values being stored in a code table, wherein the character sequence being substituted is selected based upon a frequency that the character sequence is found within the record;**

[0016] As discussed previously with regard to independent claim 1, the cited art fails to teach of suggest to one of ordinary skill in the art "compressing the records by substituting a value for a character sequence in the records, the values being stored in a code table, wherein the character sequence being substituted is selected based upon a frequency that the character sequence is found within the record". Independent claim 9 is allowable for at least the reasoning given with regard to claim 1. As such, claim 9 is in proper form for immediate allowance. Applicant respectfully requests that the Examiner withdraw the rejection of claim 9.

[0017] **Independent claim 14** has been amended to recite in pertinent part a computer-readable medium comprising computer-executable instructions that, when executed, direct a computing system to:

> compress program data for an electronic program guide at the head end device by substituting a value for a character sequence in the program data, the values being stored in a code table, wherein the character sequence being substituted is selected based upon a frequency that the character sequence is found within the program data;

[0018] As discussed previously with regard to independent claim 1, the cited art fails to teach of suggest to one of ordinary skill in the art instructions to "compress program data for an electronic program guide at the head end device by substituting a value for a character sequence in the program data, the values being stored in a code table, wherein the character sequence being substituted is selected based upon a frequency that the character sequence is found within the program data". Independent claim 14 is allowable for at least the reasoning given with regard to claim 1. As such, claim 14 is in proper form for immediate allowance. Applicant respectfully requests that the Examiner withdraw the rejection of claim 14.

[0019] **Independent claims 21 and 24** have been canceled. The cancelation of these claims thus renders their rejections moot.

Conclusion

[0020] All pending claims are in condition for allowance. Applicant respectfully requests reconsideration and prompt issuance of the application. If any issues remain that prevent issuance of this application, the **Examiner is urged to contact me before issuing a subsequent Action**. Please call/email me or my assistant at your convenience.

Respectfully Submitted,

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